



December 16, 2014

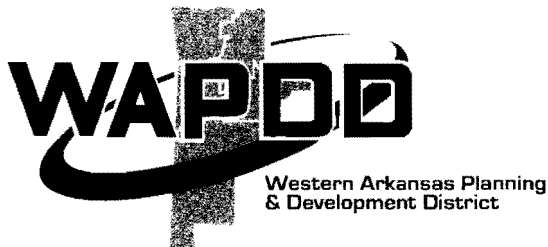
Environmental Management Support, Inc.
Attn: Mrs. Edie Findeis Cromwell
8601 Georgia Avenue, Suite 500
Silver Spring, MD 20910

Dear Mrs. Cromwell,

Western Arkansas Planning and Development District (WAPDD) is a multicounty regional economic organization established in 1966 to assist western Arkansas communities with the planning for and development of local and regional projects. It is one of 8 statewide planning and development districts in Arkansas established through the Public Works and Economic Development Act of 1965. Each district covers 6 to 12 Arkansas counties with common economic problems and opportunities. In addition to assessing the potential for economic development for the area, the districts are the means by which the counties interact with state and federal economic development offices. WAPDD covers 6 counties within western Arkansas: Sebastian, Crawford, Franklin, Logan, Polk, and Scott.

WAPDD is requesting \$400,000 in EPA Brownfields Assessment Grant funding; \$200,000 for Hazardous Substances and \$200,000 for Petroleum. WAPDD plans to use the EPA Brownfields Assessment Grant to assess sites within 4 target communities; Fort Smith, Booneville, Mulberry, and Ozark. WAPDD has already inventoried the brownfields within these 4 target communities.

- a. Applicant Identification:
Western Arkansas Planning and Development District
PO Box 2067
Fort Smith, AR 72902
- b. Applicant DUNS Number: 010318145
- c. Funding Request:
 - i.) Grant Type: Assessment
 - ii.) Federal Funds Requested: \$400,000
 - iii.) Contamination: \$200,000 Hazardous Substances and \$200,000 Petroleum
 - iv.) Community-wide
- d. Location: Fort Smith (Sebastian County), Mulberry (Crawford County), Ozark (Franklin County), Booneville (Logan County)



- e. Not Applicable, as application is Community-Wide.
- f. Contacts:
 - i.) Project Director: Tracee McKenna, Director of Community Development, Western Arkansas Planning and Development District, PO Box 2067, Fort Smith, AR 72902; 479-785-2651 (phone); 479-785-1964 (fax); tmckenna@wapdd.org
 - ii.) Chief Executive: Sasha Grist, Executive Director, Western Arkansas Planning and Development District, PO Box 2067, Fort Smith, AR 72902; 479-785-2651 (phone); 479-785-1964 (fax); sgrist@wapdd.org
- g. Date Submitted: December 19, 2014
- h. Project Period: October 1, 2015 – September 30, 2018
- i. Population:
 - i.) 260,065 (U.S. Census Bureau, 2010)
 - ii.) 95,538 (U.S. Census Bureau, 2010; Fort Smith, Mulberry, Ozark, Booneville)
- j. Other Factors Checklist: Attached

Sincerely,

Sasha Grist
Executive Director

Enclosures

Attachments:

Other Factors Checklist

Threshold Documentation

Letter from Arkansas Department of Environmental Quality

Letters of Support from Community-Based Organizations

Fort Smith CBID

Beautify Fort Smith

Fort Smith Housing Authority

Booneville Development Corporation/South Logan County Chamber of Commerce

Main Street Ozark

Ozark Chamber of Commerce

Narrative Proposal

V.B.1 Community Need

V.B.1.a Targeted Community and Brownfields

V.B.1.a.i Targeted Community Description: Western Arkansas Planning and Development District (WAPDD) serves 6 counties within rural western Arkansas: Sebastian, Crawford, Franklin, Logan, Polk, and Scott. Within these 6 counties are both north-south and east-west transportation networks that helped establish western Arkansas as a manufacturing region; Interstate 40, U.S. Route 71, and the future Interstate 49 that will roughly follow the U.S. Route 71 alignment. Additionally, the Arkansas River contributed greatly to western Arkansas' industrialization. Western Arkansas has a rich history in coal mining and timber. Franklin County is the site of one of the first oil strikes in Arkansas and Logan County is home to some of the oldest settlements in western Arkansas. Fort Smith is home to two National Guard Bases: Ebbing Air National Guard Base which houses the 188th Fighter Wing and Fort Chaffee, a former U.S. Army base.

WAPDD plans to utilize the EPA Brownfields Grant to assess brownfields within 4 target communities; Fort Smith, Booneville, Mulberry, and Ozark. WAPDD has already inventoried the brownfields within these 4 communities.

These four target communities were chosen for their economic conditions, revitalization efforts, and redevelopment opportunities.

Fort Smith (population 86,209), located in Sebastian County, is the second-largest city in Arkansas. It is home to large manufacturing plants; 2 large hospitals that provide healthcare for the entire region; and the University of Arkansas at Fort Smith. Manufacturing, trucking, and food-processing sectors employ thousands of people within the Fort Smith region. Fort Smith's brownfields arise largely from a shift in population and development from the west side of the city to the east side. A shift that began in the 1970s with the construction of the first segment of Interstate 540 that connected Fort Smith and Van Buren to Interstate 40. This shift has left a number of manufacturing facilities that were once the economic center of the community empty and dilapidated. The housing that was developed around these facilities to provide homes for the factory workers remains, but without those factory jobs, residents must commute further for employment. The population that has remained in this area after the shift is those that have been unable to afford to follow the development eastward. In the late 1970s, 2 of Fort Smith's last remaining glass companies, once a thriving industry, closed. The Harding Glass Company and Radiant Glass Company remain abandoned today and are included in Fort Smith's brownfields inventory. More recent plant closings in Fort Smith include that of Whirlpool in 2012 resulting in 917 jobs lost. Additional brownfields identified in Fort Smith include old gas stations and auto repair shops, an electric substation, and vacant downtown buildings. Many of these are located in residential areas and near schools.

Booneville (population 3,990), located in Logan County, consists mostly of retail stores and small industries. Community leaders organized the Booneville Development Corporation to attract industry. In 1955, Ace Comb Company moved into town and remained in business for a number of years before closing and resulting in 340 jobs lost. The building now sits empty and has been included in Booneville's brownfields inventory. Cargill operated in Booneville until March 23, 2008, when a large fire destroyed the plant resulting in the loss of 800 jobs. In addition to the Ace Comb Company, Booneville's brownfields also include former gas stations, and vacant downtown buildings, all near residential areas.

Mulberry (population 1,655), located in Crawford County, is situated on the Interstate 40 corridor. Located on the Mulberry River, recreational opportunities and rich farmland are abundant. In 2012, American Vegetable Soybean and Edamame Inc. built a 32,000 square foot plant in Mulberry to process locally grown edamame, a specialized soybean product typically imported from China. In 2013, Greenwave Foods, Inc., an affiliate of American Vegetable Soybean and Edamame, began construction of a 20,000 square foot facility to freeze-dried edamame. Mulberry's brownfields include former gas stations, and vacant downtown buildings, all near residential areas.

Ozark (population 3,684), located in Franklin County, is one of the state's oldest cities. It is located along Interstate 40 and the Arkansas River. In 1888, a vegetable canning factory became Ozark's first industry. No longer in business, it has been replaced with larger industries such as Butterball turkey processing, SGL Carbon, and Baldor. The city is also the home of the Ozark campus of Arkansas Tech University. Ozark's brownfields include the former Arkansas Electric Cooperative Corporation building, and former gas stations and auto repair shops. Like the other targeted communities, Ozark is also facing a declining downtown district plagued with vacant buildings, resulting in a concentrated area for brownfields.

The declining downtown districts of the 4 target communities are a result of improved transportation routes making it easier for people to travel longer distances to work and shop and also the advent of the big box store. For those without the means to travel due to income or other factors, this creates a burden that a revitalized downtown would help eliminate. Furthermore, the declining downtown districts mean a loss of valuable sales and property tax revenue for the cities.

V.B.1.a.ii Demographic Information:

	Fort Smith	Booneville	Mulberry	Ozark	Arkansas	National
Population ¹	86,209	3,990	1,655	3,684	2,915,918	308,745,538
Unemployment ²	6.9%	6.9%	6.9%	6.9%	6.9%	6.7%
Poverty Rate	21.1% ³	24.0% ⁴	19.0% ⁴	34.5% ⁴	14.6% ³	11.8% ³
Percent Minority ¹	30.7%	6.5%	4%	5%	23%	26.7%
Median Household Income	\$35,989 ³	\$27,279 ⁴	\$37,782 ⁴	\$25,917 ⁴	\$40,112 ³	\$51,371 ³
Supplemental Security Income	7.0% ³	13.6% ⁴	9.7% ⁴	10.7% ⁴	7.2% ³	5.4% ³
Food Stamps/SNAP Benefits (households) ⁴	19.0% ³	30.0% ⁴	22.0% ⁴	24.3% ⁴	15.5% ³	13.6% ³
Free/Reduced Lunches ⁵ (2013-2014)	71.7%	71.6%	76.4%	55.1%	60.9%	

¹ Data is from 2010 U.S. Census

² Data is from Bureau of Labor Statistics

³ Data is from 2012 American Community Survey

⁴ Data is from 2009-2013 American Community Survey 5-year Estimates

⁵ Data is from Arkansas Department of Education

The U.S. Median Household Income is \$51,371, but the Median Household Income for the 4 target communities is much lower at between \$25,917 and \$37,782. The poverty rate for families in the 4 target communities is much higher than that of the United States poverty rate. As a result, the percentage of people in the 4 target communities that receive Supplemental Security Income and Food Stamps/SNAP benefits is also much higher than the national rate. Furthermore, the percentage of students within the 4 target areas that receive Free/Reduced Lunches at school is between 55.1% and 76.4%.

V.B.1.a.iii Brownfields: WAPDD has identified 101 brownfields within its 4 target communities.

In the target community of Fort Smith, WAPDD has identified 49 brownfields. These brownfields consist of former gas stations and auto repair shops, factories, an electric substation, and vacant downtown buildings in the West Garrison Avenue Historic District; all concentrated on the west side of Fort Smith. Many of these facilities became and remain vacant in the 1970s after a shift in population and development from west Fort Smith to east Fort Smith. Many of these facilities are located in residential areas near elementary schools within the Fort Smith School District and also near properties managed by the Fort Smith Housing Authority. Along Midland Avenue, the former industrial center of Fort Smith, WAPDD has identified 16 brownfields within close proximity to 4 schools and also a Fort Smith Boys and Girls Club. Some of the identified brownfields include 2 former glass plants, Harding Glass Company and Radiant Glass Company; the Littlefield Oil property; and an OGE substation.

At this time, WAPDD has identified 9 brownfields in the targeted community of Booneville. These brownfields consist of former gas stations, vacant downtown buildings within the Booneville Commercial Historic District, and a former factory. The former Ace Comb factory is located within close proximity to a hospital and a nursing home and is listed on www.asbestosnews.com as a location where its probable employees were exposed to asbestos.

In the target community of Mulberry, WAPDD has identified 11 brownfields. These brownfields include vacant downtown buildings, and former gas stations. One of the former gas stations, the Mulberry Market, has previously had a reported leak according to ADEQ.

In the target community of Ozark, WAPDD has identified 32 brownfields. Many of these brownfields are concentrated in the Ozark Courthouse Square Historic District and include the former Arkansas Electric Cooperative Corporation building which is listed on www.asbestosnews.com as a location where its probable employees were exposed to asbestos. Other identified brownfields include former gas stations and auto repair shops.

Priority Sites	Contaminants	Health Effects ¹
Former Glass Companies (Fort Smith) Littlefield Oil Property (Fort Smith) OGE Substation (Fort Smith)	Asbestos; Mold; RCRA metals (e.g. Lead and Cadmium); Volatile Organic Compounds (VOCs)(e.g. Benzene, Gasoline, Solvents);	respiratory problems (asthma, asbestosis, mesothelioma); eye, nose, and throat irritation; headaches; loss of coordination; nausea; damage to liver, kidneys,
Ace Comb Factory (Booneville)	Polycyclic Aromatic Hydrocarbons (PAHs);	central nervous system, and immune system; cardiovascular and digestive problems; developmental issues
Arkansas Electric Cooperative Corporation Building (Ozark)	Polychlorinated Biphenyls (PCBs)	
Mulberry Market (Mulberry)		
Vacant Downtown Buildings		

¹ Agency for Toxic Substances and Disease Registry (ATSDR)

V.B.1.a.iv Cumulative Environmental Issues: There has 1 Superfund sites among the 4 target areas. Industrial Waste Control in Fort Smith has been cleaned up and is no longer a threat to human health. It has been deleted from the NPL and is known as a Deleted NPL site. United States Forgecraft is a former State Priority List (SPL) site in Fort Smith. It was removed from the RATFA SPL in June 2010.

The Whirlpool Corporation which closed its Fort Smith plant in 2012, resulting in 917 jobs lost, is working with the Arkansas Department of Environmental Quality (ADEQ) to address Trichloroethylene (TCE) detected in the groundwater immediately below and adjacent to the Fort Smith property. Prior to the mid-1980s, the facility utilized TCE. The use of TCE was discontinued in the mid-1980s. It is believed that constituents in the soil and groundwater identified in the facility investigations were the result of historical work practices by Whirlpool prior to 1981. ADEQ has determined there have been no human exposure to the TCE here, and thus no health risk to area residents. In December 2013, ADEQ issued a Final Remedial Action Decision Document (RADD) laying out the science-based remediation plan Whirlpool will follow to attack and remove the TCE from the groundwater.

According to National Weather Service, the 4 target communities receive nearly 50 inches of rainfall each year, compared to the U.S. average of 30 inches. The petroleum and hazardous waste materials that might be present at brownfields sites can flow into shallow groundwater sources, lakes and rivers, creating a higher risk for health issues. Other sources of water and soil pollution include agricultural runoff. Arkansas is 41% farm land making agriculture pollution a real concern. WAPDD's 6 county area includes 5,258 farms totaling 766,704 acres of farmland.

Another source of pollution for the 4 target communities is the major interstates and highways that dissect them. Interstate 40 has an average daily traffic estimate of 23,000 where it passes through Ozark and Mulberry (Arkansas Highway and Transportation Department 2013 Annual Average Daily Traffic Estimates). Interstate 540 in Fort Smith has an average daily traffic estimate of 52,000. In addition, Highway 71 through Fort Smith has an average daily traffic estimate of 25,000 and Highway 10 in Booneville has an average daily traffic estimate of 8,700. Mobile sources account for more than half of all the air pollution in the United States (www.epa.gov).

Since 2003, ADEQ has investigated 186 illegal dumps in WAPDD's 6 county area; Fort Smith has had 7, Booneville 6, Mulberry 1, and Ozark 12.

ADEQ records show that among the 4 target communities are 175 facilities with above ground or underground storage tanks, and 48 of them have reported leaks, including the Mulberry Market site in Mulberry that is included in Mulberry's brownfields inventory. Many of these facilities are located within the same area as the identified brownfields.

ADEQ also identifies 21 methamphetamine contaminated properties within the 4 target communities.

V.B.1.b Impacts on Targeted Community: WAPDD has identified 101 brownfields within its 4 target communities including former gas stations and auto repair shops, old factories, vacant downtown buildings, and an electric substation. Most all are near residential areas with some close to schools and a nursing home.

The contaminants believed to be present at these sites include many known carcinogens, including Benzene.

Benzene and other chemicals found in petroleum products have been determined to cause cancer. From 2006 to 2010, the 4 counties that contain the 4 target communities (Sebastian, Logan, Crawford, and Franklin) saw 5341 cases of invasive cancer, making the 4 county average age-adjusted rate 438.2 per 100,000 people.

Lead and Asbestos are 2 other identified contaminants.

Lead exposure affects the nervous system and can cause a range of health effects from behavioral problems and learning disabilities to seizures and death. Children 6 years old and younger are most at risk. Lead in pregnant women can cause miscarriage, premature birth, low birth weight, and subsequent developmental delays in their children.

Asbestos-related lung diseases are diseases caused by exposure to asbestos fibers and include pleural plaque, pleural effusion, asbestosis, mesothelioma, and lung cancer. (National Heart, Lung and Blood Institute)

According to the Department of Health and Human Services, all 6 of the WAPDD counties have a higher rate of lung cancer than the national rate. The average rate of lung cancer per 100,000 people across the 4 counties with the 4 target communities is 100. The national rate is only 52.6. (Department of Health and Human Services, CHSI 2009)

Additional contaminants and related health effects are included in section V.B.1.a.iii (page 3).

Another health hazard associated with the vacant buildings of our downtown districts is pollution and contamination from bird droppings. Birds are known to carry over 60 transmissible diseases, some potentially fatal, including histoplasmosis. In the United States, the highest incidence of histoplasmosis occurs in a region often referred to as the "Histo Belt", where up to 90% of the adult population has been infected by histoplasmosis. Arkansas is part of this region.

According to the National Alliance to End Homelessness, homeless rates in Arkansas rose substantially between 2009 and 2011. Overall homelessness was up 20%, while chronic homelessness rose 23%. The number of homeless people in families increased by 37% and the number of homeless veterans increased by 65%. According to the U.S. Department of Housing and Urban Development, 64% of Arkansas' homeless are unsheltered. Homeless individuals and families with nowhere else to go may seek shelter in abandoned buildings contaminated with asbestos, lead-based paint, and bird droppings.

The impacts of brownfields on the 4 target communities are not only health related. There are also social/welfare impacts. Brownfields have led to a decrease in community pride, especially in regards to the declining downtown districts of the 4 target communities. Additionally, brownfields have resulted in a reduction of local jobs due to the brownfields that have resulted from plant closings, e.g., Ace Comb Factory in Booneville and Harding and Radiant Glass Companies in Fort Smith. In Ozark, brownfields have led to impaired business growth due to reluctance by a local entrepreneur to open a new business because of contamination concerns at the former Arkansas Electric Cooperative Corporation building.

V.B.1.c Financial Need

V.B.1.c.i Economic Conditions: The rural nature of WAPDD limits the ability of the cities and towns within the district to draw on other sources of funding for brownfields assessments and cleanups. **Three of the 4 target communities (Ozark, Booneville, and Mulberry) have populations of less than 5,000.**

Three of the 4 target communities (Fort Smith, Ozark, Mulberry), saw a less than 10% increase in population from 2000 to 2010. The other target community, Booneville, had a 3% decrease in population. The population decline has further limited the area's tax base resulting in a decrease in local sales tax revenue.

Western Arkansas is still recovering from the loss of major manufacturing jobs in recent years. Most recently, on June 29, 2012, Whirlpool closed its Fort Smith manufacturing plant resulting in 917 jobs lost. However, in 2004 Whirlpool's Fort Smith plant employed 4600. As a direct result of Whirlpool closing, Fortis Plastics LLC and ILPEA both also closed their Fort Smith operations resulting in 134 more jobs lost. According to a University of Arkansas at Little Rock study, **the loss of the Whirlpool jobs will result in the overall loss of 1550 jobs and a labor income reduction of \$56.9 million.** In February 2012, the Air Force re-missioning plan called for the 188th Fighter Wing based at Fort Smith's Ebbing Air National Guard Base to lose its 20 A-10 aircraft. In September 2013, the first 2 A-10s departed Fort Smith. The 188th Fighter Wing continued to lose aircraft until June 2014 when the final 2 departed. The future of the 188th Fighter Wing is still unknown at this time. The unit employs 350 full time personnel, with about 1,000 on the base once a month for training. **An annual impact to the community of approximately \$150 million is expected.** Prior to these most recent events, on **March 23, 2008, a series of explosions destroyed the Cargill Meat Solutions Plant in Booneville resulting in 800 jobs lost.** Shortly afterward, Cargill announced it would not rebuild the plant. According to the Institute for Economic Advancement at the University of Arkansas at Little Rock, **the loss of the Cargill Plant represents approximately \$20 million in payroll lost and an additional 2834 indirect jobs affected and 730 induced jobs affected for a total of 4364 total jobs affected.**

Declining downtown districts have led to lost business opportunities, depressed property values, and a reduced tax base.

In recent years numerous natural disasters have resulted in significant economic disruptions. In 2008, Arkansas experienced 5 presidentially declared disasters, including FEMA Disaster #1751 for severe storms, tornadoes, and flooding in Sebastian, Crawford, Franklin, Logan, and Scott Counties. Other declared disasters have included 2009 FEMA Disaster #1819 for severe winter storms in Franklin and Crawford Counties; and 2011 FEMA Disaster #4000 for severe storms, tornadoes, and flooding in Franklin and Crawford Counties, and most recently 2013 FEMA Disaster #4124 for severe storms, tornadoes, and flooding in Scott and Polk Counties and 2013 FEMA Disaster #4160 for severe winter storms in Sebastian, Crawford, Franklin, Logan, Scott, and Polk Counties.

V.B.1.c.ii Economic Effects of Brownfields: Downtown districts have always played an important role to the communities within the WAPDD area. Within all 4 of the target communities, the downtown districts have always been a source of pride, as well as revenue for these communities. A number of factors such as changing shopping habits, transportation methods, and development patterns have led to the deterioration of many of these downtowns resulting in blight, property vacancy, and community disinvestment. Among the 4 target communities are 3 historic downtown districts; Ozark Courthouse Square Historic District, Booneville Commercial Historic District, and the West Garrison Avenue Historic District in Fort Smith. Each of these communities also has organizations committed to revitalizing and developing these downtown districts; Ozark Main Street, Booneville Development Corporation, and the Fort Smith Central Business Improvement District. Declining downtown districts, as well, as the other identified brownfields, equal lost business opportunities, depressed property values and a reduced tax base. Between 2000 and 2011, within the 4 counties with the 4 target communities the average increase in property assessments was only 31%. **The effects of these brownfields on the target communities are evident in the table in section V.B.1.a.ii (page 2).** The 4 target communities average 10.3% of the population receives Supplemental Security Income and 23.8% receive Food Stamps/SNAP Benefits. The national rates are 5.4% for Supplemental Security Income and 13.6% for Food Stamps/SNAP Benefits.

The average poverty rate among the 4 target communities is 24.7%, much higher than the national rate of 11.8%. In the target community of Ozark, the poverty rate is 34.5%. While the national Median Household Income is \$51,371, the average Median Household Income for the 4 target communities \$31,742. The Median Household Income for the target community of Ozark is only \$25,917.

V.B.2 Project Description and Feasibility of Success

V.B.2.a Project Description

V.B.2.a.i Project Description: WAPDD plans to perform 8 to 10 Phase I Environmental Site Assessments (ESA) and 3 to 6 Phase II ESAs at both hazardous substance and petroleum sites following a complete inventory of the brownfields within the 6 county district. Of the \$400,000 requested, 94% will go towards the contractual budget categories, and 95% of the contractual budget categories will go toward Site Assessments.

Public forums, community group meetings, and individual meetings with city and county leaders will be held in the 4 target communities to select and prioritize sites for assessment.

WAPDD's 4 target communities were chosen in part because of ongoing redevelopment efforts in these communities. The Fort Smith Central Business Improvement District, Main Street Ozark, and the Booneville Development Corporation all lead revitalizations efforts within their communities. Because many of the brownfields within our target communities are located within the downtown districts, these revitalization and redevelopment efforts share common goals with the brownfields program. The City of Fort Smith has a Comprehensive Plan that includes Downtown Fort Smith and the Riverfront as focus areas with goals that include protecting and improving existing neighborhoods and protecting natural resources and reducing waste and overuse. The Fort Smith Central Business Improvement District is currently working a Strategic Plan. The City of Ozark, in conjunction with Main Street Ozark, is currently working to develop its riverfront which adjoins Ozark's downtown district. The Comprehensive Economic Development Strategy (CEDS) for WAPDD includes brownfields redevelopment in its goals. In addition, the State of Arkansas 2010-2015 Consolidated Plan lists commercial-industrial rehabilitation as a high priority among Priority Community Development Needs.

Through WAPDD's brownfields inventory, sites for possible commercial redevelopment and affordable housing have been identified within the 4 target communities. The perception of contamination has previously prevented these sites from being redeveloped. In Ozark, a local entrepreneur has expressed interest in opening a restaurant in a former utility building, but is concerned about possible contamination. In Fort Smith, the Fort Smith Housing Authority has interest in several properties for the purpose of constructing affordable housing, but also has concerns of possible contamination.

V.B.2.a.ii Project Timing: In order to measure progress and ensure completion within 3 years, WAPDD plans to work closely with its EPA Region 6 Project Manager to produce a schedule of activities as part of a work plan. WAPDD staff will compare the project schedule with accomplishments in Quarterly Reports to the EPA. WAPDD will meet periodically with its EPA Region 6 Project Manager to ensure that outputs are delivered on time and that outcomes are tracked going forward. WAPDD will also update property information in the Assessment, Cleanup and Redevelopment Exchange System (ACRES) as another way of tracking and measuring progress.

WAPDD expects project activities to begin approximately October 2015. Community Outreach efforts will begin at this time and will continue throughout the duration of the project. Through its Community Outreach

efforts, WAPDD will begin to prioritize and select sites for assessment. The site selection process, to include obtaining permission from property owners and securing site access, is expected to take place between October 2015 and March 2016. During this time, WAPDD will also procure the contractor who will conduct the Phase I and Phase II assessments. Assessment work is expected to be completed between March 2016 and March 2018. Cleanup Planning will follow and is expected between March 2018 and September 2018.

The expectation is that the assessment activities will lead to cleanup and redevelopment, and eventually will result in job creation, creation of greenspace, and minimization of hazards to human health and the environment. WAPDD has sufficient resources to complete this project and the capability to do so in a timely manner while complying with the program's technical requirements to include.

V.B.2.a.iii Site Selection: With input gained from public forums and community group meetings, as well as individual meetings with city and county leaders, WAPDD will prioritize, and select sites for assessment. WAPDD has already been working with city leaders in 4 communities (Fort Smith, Mulberry, Ozark, and Booneville) to inventory their brownfields. Sites that demonstrate the greatest potential of completing redevelopment once the assessment phase is complete will be considered more seriously based on the following criteria: level of perceived contamination and threat to human health and the environment, potential of the site for redevelopment and job creation, current ownership and willingness to participate, level to which redevelopment will alleviate blight, and proximity of the site to sensitive populations. Owners of selected preliminary sites will be provided with information, including a summary of the proposed work and an explanation of the program. Written approval for access will be required. Any site in which the owner denies access will be removed from the program.

Based on these criteria, WAPDD has identified these high priority sites: Arkansas Electric Cooperative Corporation building in Ozark; Harding and Radiant Glass Companies, Littlefield Oil property, and OGE substation in Fort Smith; Ace Comb Factory in Booneville; Mulberry Market in Mulberry; and numerous vacant downtown buildings throughout the 4 target communities.

V.B.2.b Task Description and Budget Table

V.B.2.b.i Task Description: WAPDD requests \$400,000 (\$200,000 Hazardous Substance and \$200,000 Petroleum) in EPA Brownfields funds to accomplish the following tasks:

Task 1: Program Management: Hazardous Substance \$6000 and Petroleum \$6000

Description: Program Management to include quarterly reports, financial status reports, reporting within Assessment, Cleanup, Redevelopment Exchange System (ACRES) and any other required submittals, as well as travel to one national EPA Brownfields Conference and regional conferences/workshops, and advertising for bids for contractual services. WAPDD will hire a qualified environmental consultant with brownfields experience to conduct assessments and assist with cleanup planning following procedures detailed in 40 CFR 31.36.

Basis for Estimated Cost: Staff time at **\$3000** to include quarterly and financial reports and any other required submittals. Travel for one staff member to one national conference and regional conferences at **\$2500** (airfare, hotel, registration, meals for national conference; and mileage, hotel, registration, meals for regional conferences). Advertising for bids for contractual services at **\$500**, based on recent ads placed in a statewide newspaper.

Projected Outputs: Management and oversight to ensure progress under EPA approved work plan. Quarterly updates and fiscal reports to the EPA and attendance at national and regional brownfields conferences.

Task 2: Community Outreach/Site Selection: Hazardous Substance \$4000 and Petroleum \$4000

Description: Educational materials (culturally appropriate) to include posters, brochures, flyers, brownfields page on WAPDD's website. Public forums and community group meetings to inform the public of the project and to obtain feedback and concerns of property owners and the public in order to prioritize and select sites for assessment.

Basis for Estimated Cost: Staff time to plan and conduct public forums and community group meetings and update WAPDD website at **\$3000**. Travel to communities for meetings at **\$500**. Supplies at **\$500** for printed educational materials, based on prices at Vistaprint.

Projected Outputs: At least 8 public forums (2 in each target community over the 3 year period), attendance at other community group meetings, printed educational materials, and information on WAPDD website.

Task 3: Site Assessment: Hazardous Substance \$178,500 and Petroleum \$178,500

Description: Perform Phase I and Phase II Environmental Site Assessments (ESAs). The assessments will be conducted in compliance with the requirements of All Appropriate Inquiry, applicable ASTM standards and practices. Contractor procurement will be in the form of competitively bid professional services contracts. All procurement will follow guidelines described in 40 CFR 31.36.

Basis for Estimated Cost: Environmental consultant time at **\$178,500** for approximately 8 to 10 Phase I ESAs (estimated cost \$2500-\$3500 each) and 3 to 6 Phase II ESAs (estimated cost \$25000-\$50,000 each), based on information gathered about previous assessments throughout Arkansas from local environmental consultants and local community officials. The cost for completing Phase I and Phase II ESAs will vary depending on the complexity of the sites.

Projected Outputs: The completion of approximately 8 to 10 Phase I and 3 to 6 Phase II ESAs.

Task 4: Cleanup Planning: Hazardous Substance \$11,500 and Petroleum \$11,500

Description: Develop a plan for cleanup/redevelopment of the assessed sites. WAPDD will consult with Arkansas Department of Environmental Quality (ADEQ) for guidance for best practices, procedures, etc. All efforts will be made to utilize Arkansas' Voluntary Cleanup Program following assessment activities for those sites that require cleanup.

Basis for Estimated Cost: Staff time to work with the environmental contractor and local officials and also consult with ADEQ at **\$2,000**. Travel to communities for cleanup planning meetings at **\$500**. Environmental consultant time at **\$9,000** for 3 cleanup plans at \$3,000 per plan.

Projected Outputs: Detailed plans for cleanup of selected sites, including best management practices, procedures, quality assurance/quality control, proper disposal techniques, institutional controls, sustainable redevelopment practices, etc.

V.B.2.b.ii Budget Table

Budget Categories	Project Tasks-Hazardous				
	Task 1 Program Management	Task 2 Community Outreach/Site Selection	Task 3 Site Assessment	Task 4 Cleanup Planning	TOTAL
Hazardous					
Personnel	\$3,000	\$3,000	\$0	\$2,000	\$8,000
Fringe	\$0	\$0	\$0	\$0	\$0

Travel	\$2,500	\$500	\$0	\$500	\$3,500
Equipment	\$0	\$0	\$0	\$0	\$0
Supplies	\$0	\$500	\$0	\$0	\$500
Contractual	\$0	\$0	\$178,500	\$9,000	\$187,500
Other-Advertising	\$500	\$0	\$0	\$0	\$500
TOTAL	\$6,000	\$4,000	\$178,500	\$11,500	\$200,000
Budget Categories	Project Tasks-Petroleum				
Petroleum	Task 1 Program Management	Task 2 Community Outreach/Site Selection	Task 4 Site Assessment	Task 5 Cleanup Planning	TOTAL
Personnel	\$3,000	\$3,000	\$0	\$2,000	\$8,000
Fringe	\$0	\$0	\$0	\$0	\$0
Travel	\$2,500	\$500	\$0	\$500	\$3,500
Equipment	\$0	\$0	\$0	\$0	\$0
Supplies	\$0	\$500	\$0	\$0	\$500
Contractual	\$0	\$0	\$178,500	\$9,000	\$187,500
Other-Advertising	\$500	\$0	\$0	\$0	\$500
TOTAL	\$6,000	\$4,000	\$178,500	\$11,500	\$200,000

V.B.2.c Ability to Leverage: WAPDD is committed to the success of this brownfields project. When applicable, WAPDD will pursue Arkansas Department of Environmental Quality (ADEQ) funds for Targeted Brownfields Assessments (TBA) for qualified hazardous substance sites (non-profit or public sector). Recently, ADEQ completed the assessment and remediation of the Fort Smith Jenny Lind Zinc Smelter site through its Targeted Brownfields Assessments program.

Additionally, WAPDD will utilize the ADEQ's Voluntary Clean-Up program when possible and applicable. Beautify Fort Smith has committed to providing financial support for any sites that are redeveloped as greenspace. Additional funding sources will be aggressively pursued and policies implemented to foster the redevelopment of the brownfield sites.

WAPDD actively pursues funding through the Arkansas Historic Preservation Program. These funds could be used to further the revitalization of qualified brownfields, such as those located within historic districts. WAPDD also has plans to apply for funding through USDA and also the Arkansas Department of Finance and Administration (ADFA) in order to develop low income housing programs in several of the WAPDD communities, including Booneville and Ozark. The Arkansas Department of Parks and Tourism funds parks and trails through its Outdoor Grants Program. The Arkansas Highway and Transportation Department also offers a Recreational Trails Program. The Arkansas Economic Development Commission (AEDC) offers HUD Community Development Block Grant (CDBG) funds for low to moderate income communities to construct community facilities. The City of Ozark plans to pursue CDBG funds in 2015 for an art center to be located in one of its vacant downtown buildings. Funding from each of these programs will be sought to ensure the successful revitalization of brownfields sites.

Recent examples of leveraging include numerous water projects across the WAPDD area utilizing both USDA (grant and loan funds) and HUD (Community Development Block Grant) funds in order to extend water lines to new customers who were previously not served by a public water system, including the target community of Booneville. In addition, a Senior Citizens Center/Tornado Shelter was built using FEMA and HUD (Community Development Block Grant) funds, as well as private funds, in the target community of Mulberry. All of the HUD-CDBG Economic Development projects described in the Past Performance and Accomplishments Section were completed using not only HUD funding, but also private funds.

V.B.3 Community Engagement and Partnerships

V.B.3.a Plan for Involving Targeted Community and Other Stakeholders; and Communicating Project Progress

V.B.3.a.i. Community Involvement Plan: WAPDD will involve the community throughout the grant project by communicating project plans and updates, as well as allowing for community input regarding prioritization and selection of brownfields sites to be assessed and re-use planning. These public outreach efforts will include public forums and community group meetings, printed educational materials, the WAPDD website as well as social media such as Facebook and Twitter, coverage by the local newspapers that serve the 4 target communities (Times Record, Ozark Spectator, Booneville Democrat, and Press-Argus Courier), radio and television coverage using local stations.

Meetings with the public will address site prioritization and selection, cleanup and reuse planning and project progress. Public forums will be defined as meetings held by WAPDD publicly advertised and open to the general public and held within the community at local churches, civic clubs, and schools rather than local government buildings to ensure a comfortable and familiar setting. WAPDD plans on conducting 8 public forums during this project; 2 in each target community. Community group meetings will be defined as meetings held by other organizations, which may or may not be open to the public where WAPDD is presenting information on the brownfields program. Examples of community group meetings include local Chambers of Commerce meetings, Rotary meetings, meetings with **Community Organizations identified in section V.B.3.c. (page 12)**, and meetings at local senior activity and youth centers. All meetings will be held at handicapped accessible facilities.

Printed educational materials to include posters, brochures and flyers will also be distributed throughout the 4 target communities. A limited number of materials will also be printed in Spanish. Most of the Spanish materials will be utilized in the target community of Fort Smith where 12.5% of the population is Spanish speaking. Among the 3 other target communities (Booneville, Mulberry, and Ozark) the Spanish speaking population is 1% or less. Additionally, translators will be available for public forums, if needed.

V.B.3.a.ii. Communicating Progress: Tracee McKenna, WAPDD Director of Community Development, will be designated as spokesperson for this project to inform the communities of actions taken, respond to inquiries and provide information. In addition to the public forums and community group meetings discussed in the Community Involvement Plan, McKenna will routinely attend City Council and County Quorum Court meetings to provide project update and progress reports related to this brownfields project. WAPDD already conducts periodic public hearings to identify community needs including recent ones in Ozark, Booneville and Mulberry. The Community Involvement Plan for this project was developed based on past experiences with previous projects. WAPDD utilizes its website as well as social media sites such as Facebook and Twitter to update the public on its projects and will do the same throughout this brownfields project.

WAPDD will also provide brochures/flyers to area schools and be available for presentations on brownfields. In addition, WAPDD plans to participate in area Earth Day and America Recycles Day events in order to educate citizens about brownfields.

V.B.3.b Partnerships with Government Agencies

V.B.3.b.i Local/State/Tribal Environmental Authority: WAPDD will partner with the Arkansas Department of Environmental Quality (ADEQ) to provide updated information on the status of brownfields across the state. WAPDD will work with ADEQ to identify sites appropriate for the state's Targeted Brownfields Assessments (TBA) program. Recently, ADEQ completed the assessment and remediation of the Fort Smith Jenny Lind Zinc Smelter site through its TBA program. When applicable, WAPDD will encourage participation in ADEQ's Volunteer Cleanup Program which ensures state oversight of cleanup operations and provides certification of completion. WAPDD currently consults with ADEQ on many of its projects to determine the project's effect on the environment. WAPDD will also partner with the Arkansas Department of Health, as well as the local health departments to present information relating to brownfields contamination and health risks to the public. With the help of the local health departments, WAPDD will ensure that appropriate measures are taken to protect area residents from contaminants during the assessment process. WAPDD acts as the Environmental Liaison to HUD for the 4 target communities.

V.B.3.b.ii Other Relevant Governmental Agencies: WAPDD has a history of successful projects with the U.S. Department of Housing and Urban Development (HUD), the Economic Development Administration (EDA), the Department of Energy (DOE), FEMA, and USDA. Many of WAPDD's projects include funding from these agencies and funds from these agencies would likely be used in the redevelopment of brownfields. WAPDD is working to expand its partnership with USDA by developing housing programs in Franklin and Logan Counties. WAPDD is also working with the Arkansas Department of Finance and Administration (ADFA) to administer its housing program (HOME). **Successful projects are outlined in section V.B.5.c.ii (page 15).** WAPDD has completed successful projects with each of the 4 target communities including a revitalization project and economic development projects with the City of Fort Smith, a senior citizens center/storm shelter with the City of Mulberry, drainage and park projects with the City of Ozark, and a drainage project with the City of Booneville.

V.B.3.c Partnerships with Community Organizations

V.B.3.c.i Community Organization Description & Role:

CBO	Contact	Contact Info.	Mission/Role	Commitment to Project
Fort Smith CBID	Richard Griffin	479-783-5191	Bring new investors and reduce blight	Prioritize sites for assessment
Beautify Fort Smith	Nancy Smreker	479-420-9907	Enhance Fort Smith	Provide volunteers & funds for greenspace development
Fort Smith Housing Authority	Ken Pyle	479-782-4991	Develop, rehabilitate & manage affordable housing	Prioritize sites for assessment & disburse info. at office & in community
Booneville Dev. Corp./South Logan County Chamber	Stacey McCollough	479-675-2666	Create a better economy/quality of life in South Logan County	Assist with identifying brownfields & disburse info. at office & in community
Main St. Ozark	Sandy Key	479-667-5337	Revitalization of downtown Ozark and Riverfront	Assist with identifying brownfields & disburse info. at office & in community

Ozark Chamber	Linda Milsap	479-667-2525	Make Ozark a better place to work and make a living	Prioritize sites for assessment & disburse info. at office & in community
---------------	--------------	--------------	---	---

V.B.3.c.ii Letter of Commitment: Attached

V.B.4 Project Benefits

V.B.4.a Health and/or Welfare and Environment

V.B.4.a.i Health and/or Welfare Benefits: Within the 4 target communities, WAPDD has identified brownfields near residential areas in close proximity to schools and a nursing home. Public health benefits associated with the assessment and eventual cleanup and redevelopment of the brownfield sites are reduced exposure of residents (especially children and the elderly) to contaminants present at brownfields (asbestos, mold, VOCs, PAHs, RCRA metals, PCBs) better air quality and safer drinking water. By identifying and addressing potential contamination at brownfields sites, health issues associated with contamination will be addressed and hopefully prevent future health issues.

Measures to protect area residents from contaminants during the assessment process will be implemented with help from the local health departments. Residents will be notified in advance of planned assessment activities. Appropriate measures to control site access will be taken, most frequently in the form of fencing. Dust control measures will be implemented as appropriate at sites with known or potential contamination. Investigative wastes will be stored, characterized, managed and disposed of in a manner that is proactive of public health and complies fully with applicable state and federal regulations. Plans will be made for the recycling of demolition materials whenever possible.

Social/welfare benefits of this project include: reduction of crime associated with vacant structures leading to increased public safety; improved quality of life due to reduced number of underutilized properties following redevelopment of brownfield sites; increased number of clean/affordable housing units due to redevelopment of brownfield sites by the Fort Smith Housing Authority; and an increase and return of community pride due to revitalization of downtown districts.

V.B.4.a.ii Environmental Benefits: Anticipated environmental benefits from this project include: improved groundwater quality, healthier surface water and aquatic environments, and safer land surfaces due to remediation of contamination following brownfields assessments; the removal of exposure risks and migration to neighboring properties; reduction of water quality impacts to local waterways; and remediation of blighted properties to kick-start revitalization.

V.B.4.b Environmental Benefits from Infrastructure Reuse/Sustainable Reuse

V.B.4.b.i Planning, Policies, Ordinances or Other Tools: The Fort Smith Central Business Improvement District, Main Street Ozark, and the Booneville Development Corporation all lead revitalizations efforts within their communities. The City of Fort Smith has a Comprehensive Plan that includes Downtown Fort Smith and the Riverfront as focus areas with goals that include protecting and improving existing neighborhoods and protecting natural resources and reducing waste and overuse. The Fort Smith Central Business Improvement District is currently working a Strategic Plan. The City of Ozark, in conjunction with Main Street Ozark, is currently working to develop its riverfront which adjoins Ozark's downtown district. The Comprehensive Economic Development Strategy (CEDS) for WAPDD includes brownfields

redevelopment in its goals. In addition, the State of Arkansas 2010-2015 Consolidated Plan lists commercial-industrial rehabilitation as a high priority among Priority Community Development Needs.

All 4 target communities participate in local Hazard Mitigation Plans that outline emergency preparedness and recovery planning. Fort Smith, Booneville, Ozark, and Mulberry all have comprehensive parks and recreation plans and are dedicated to providing these types of opportunities to their residents. Fort Smith and Ozark also both have ordinances regulating storm water management.

Many of our area's brownfields consist of abandoned or vacant buildings, which are currently serviced by existing infrastructure. This project will support the reuse of these buildings, reducing the amount of energy and resources required for new construction or required to extend utilities to undeveloped areas.

Plans will be made for recycling of demolition materials whenever possible.

V.B.4.b.ii Example of Efforts to Integrate Equitable Development or Livability Principles: The following redevelopment plans will incorporate the following livability principles: Fort Smith Housing Authority redevelopment of sites for affordable housing: Promote equitable, affordable housing; Support existing communities; Value communities and neighborhoods. Arkansas Electric Cooperative Corporation Building redeveloped as restaurant: Support existing communities; Value communities and neighborhoods.

V.B.4.c Economic and Community Benefits (long term benefits)

V.B.4.c.i Economic Benefits or Other non-Economic Benefits: Economic benefits of this project include: blight reduction that will lead to increased property tax revenue; and job creation through employment opportunities due to redevelopment. By redeveloping current brownfield properties with well-served infrastructure the cost of redevelopment will be reduced by not having to extend utilities to undeveloped areas.

Additionally, redevelopment of current structures, specifically in the downtown districts of the 4 target communities, will result in continued economic growth while reducing urban sprawl.

Preserving land for agricultural purposes is an important benefit of the brownfields program, specifically in Arkansas. Agriculture is Arkansas' largest industry. Arkansas is 41% farmland, and nearly 25% of the state's economic activity or \$16 billion annually, is from agriculture. One out of every 6 jobs is agriculture related.

Additional non-economic benefits of the brownfields program include: increased greenspace. Beautify Fort Smith has committed volunteers and financial support for any sites that are redeveloped as greenspace.

V.B.4.c.ii Job Creation Potential: Partnerships with Workforce Development Programs:

The Workforce Development division of WAPDD administers the Workforce Investment Act (WIA) across the 6 county WAPDD counties. The WIA of Western Arkansas is tasked with providing skilled workers for employers and integrating people into the workforce, as well as building a comprehensive workforce system by coordinating the service activities of federally funded workforce development programs. WAPDD will use WIA of Western Arkansas to promote local hiring and procurement. There are 3 Environmental Job Training Programs within 200 miles of any WAPDD city and town (Arkansas Construction Education Foundation, City of Camden, and City of Texarkana). As the opportunity presents,

every effort will be made to utilize these job training programs. In addition, WAPDD has spoken with Arkansas Tech University-Ozark Campus about the possibility of partnering to provide an Environmental Job Training Program at its campus.

V.B.5 Programmatic Capability and Past Performance

V.B.5.a Programmatic Capability: The Brownfields Assessment Program will be managed by Tracee McKenna, WAPDD Director of Community Development. McKenna has 11 years' experience in grant management, as well as a Bachelor of Arts degree in Broadcast Journalism and 15 years of media and public relations experience. Ashley Garris, WAPDD Project Coordinator, will assist McKenna with the financial requirements of the grant. Garris has a Bachelor of Business Administration degree and extensive accounting and grants financial management experience. WAPDD Executive Director Sasha Grist has 12 years' experience in grants management, a Bachelor of Science degree in Emergency Management and also a Master's degree in Human Resources. Grist will play a key role in retaining project leadership through continuing education and cross-training, as well as competitive salaries and benefits. WAPDD plans to contract an environmental consultant for Phase I and Phase II assessments and also cleanup planning. The contractor will be selected in compliance with the competitive procurement standards in 40 CFR Part 30 or 40 CFR 31.36, as appropriate.

V.B.5.b Audit Findings: WAPDD has not had any adverse audit findings.

V.B.5.c Past Performance and Accomplishments

V.B.5.c.ii Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements: WAPDD has over 40 years' experience in project development and administration of federal grant programs. WAPDD has a successful history of managing/performing grant agreements, including meeting reporting requirements, submitting final acceptable technical reports and reporting on our progress towards achieving the expected results.

Funding Source	Project Period	Amount	Purpose	Accomplishments
1 Dept. of Energy Grant	2010-2012	\$498,213	Provide energy updates to 7 municipal buildings	New HVAC, lights, windows, water heaters, appliances
23 HUD-CDBG Disaster Grants (6 within the target communities)	2008-Present	\$4,576,919	Provide disaster assistance for recovery and mitigation projects	13 Drainage Projects, 6 Bridge Replacements, 2 Generators, 2 Revitalization Projects
6 HUD-CDBG Economic Development Grants	2010-Present	\$3,547,780	6 Economic Development projects involving new or expanding companies	Over 400 jobs created with 51% being held by low to moderate income applicants

With each of its grants, WAPDD ensures that commitments and approved work are completed in a timely manner and that all technical and reporting requirements are also met in a timely manner. This is achieved through designated duties of WAPDD staff and weekly staff meetings to discuss upcoming deadlines. Progress is tracked through quarterly, semi-annual, and annual reports.

Assessment Other Factors Checklist

Name of Applicant: WESTERN ARKANSAS PLANNING AND DEVELOPMENT DISTRICT (WAPDD)

Please identify (with an *X*) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor	Page #
Community population is 10,000 or less.	2,5
Federally recognized Indian tribe.	
United States territory.	
Applicant will assist a Tribe or territory.	
Targeted brownfield sites are impacted by mine-scarred land.	
Targeted brownfield sites are contaminated with controlled substances.	
Recent natural disaster(s) (2006 or later) occurred within community, causing significant community economic and environmental distress.	6
Project is primarily focusing on Phase II assessments.	
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation.	
Community experienced manufacturing plant/power plant closure(s) (2008 or later) tied to the targeted brownfield sites or project area, including communities experiencing auto plant/power plant closures due to bankruptcy or economic disruptions.	6
Recent (2008 or later) significant economic disruption (<u>unrelated</u> to a natural disaster or manufacturing/auto plant/power plant closure) has occurred within community, resulting in a significant percentage loss of community jobs and tax base.	6
Applicant is one of the 12 recipients, or a core partner/implementation strategy party, of a "manufacturing community" designation provided by the Economic Development Administration (EDA) under the Investing in Manufacturing Communities Partnership (IMCP). To be considered, applicants must clearly demonstrate in the proposal the nexus between their IMCP designation and the Brownfield activities. Additionally, applicants must attach documentation which demonstrate either designation as one of the 12 recipients, or relevant pages from a recipient's IMCP proposal which lists/describes the core partners and implementation strategy parties. A core partner/implementation strategy party is a local partner organization/jurisdiction that will carry out the proposed strategy, as demonstrated in letters of commitment or memoranda of understanding which documents their contributions, roles, and responsibilities to the partnership. EDA may provide to	

EPA a list of the core partners/implementation strategy parties for each of the 12 “manufacturing community” designees, which EPA would use to verify this other factor.	
Applicant will serve an area designated as a federal, state, or local Empowerment Zone or Renewal Community. To be considered, applicant must attach documentation which demonstrates this current designation.	
Applicant is a recipient or a core partner of HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant funding or technical assistance that is directly tied to the proposed Brownfields project, and can demonstrate that funding from a PSC grant/technical assistance has or will benefit the project area. Examples of PSC grant or technical assistance include a HUD Regional Planning or Challenge grant, DOT Transportation Investment Generating Economic Recovery (TIGER), or EPA Smart Growth Implementation or Building Blocks Assistance, etc. To be considered, applicant must attach documentation.	
Applicant is a HUD Promise Zone community. To be considered, applicant must attach documentation.	
Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	

THRESHOLD CRITERIA

1. **Applicant Eligibility:** Western Arkansas Planning & Development District (WAPDD) was established as a 6 county regional organization in 1966 under the provisions of the Public Works and Economic Development Act of 1965 and applicable laws of the State of Arkansas. WAPDD is a quasi-governmental entity that operates under the supervision and control of, or as an agent of, a general purpose unit of the local government.
2. **Letter from the State or Tribal Environmental Authority:** Mr. Terry Slight, Brownfields Coordinator for the Arkansas Department of Environmental Quality (ADEQ), issued a letter acknowledging this grant proposal and their support of the planned community-wide assessment activities for Western Arkansas Planning and Development District (WAPDD). The ADEQ letter is included as an attachment.
3. **Community Involvement:** WAPDD will involve the community throughout the grant project by communicating project plans and updates, as well as allowing for community input regarding prioritization and selection of brownfields sites to be assessed and re-use planning. These public outreach efforts will include public forums and community group meetings, printed educational materials, the WAPDD website as well as social media such as Facebook and Twitter, and coverage by the local newspapers, radio and television stations.

Meetings with the public will address site prioritization and selection, cleanup and reuse planning and project progress. WAPDD plans on conducting 8 public forums during this project; 2 in each target community as well as additional community group meetings as defined in section V.B.3.a.i. of the narrative proposal. All meetings will be held at handicapped accessible facilities.

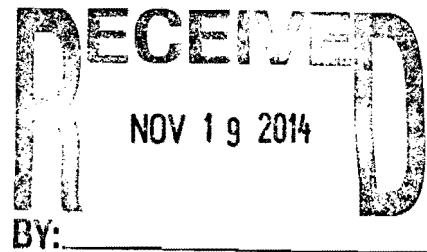
Printed educational materials to include posters, brochures and flyers will also be distributed throughout the 4 target communities. A limited number of materials will also be printed in Spanish. Most of the Spanish materials will be utilized in the target community of Fort Smith where 12.5% of the population is Spanish speaking. Among the 3 other target communities (Booneville, Mulberry, and Ozark) the Spanish speaking population is 1% or less. Additionally, translators will be available for public forums, if needed.

Full details of WAPDD's Community Involvement Plan as well as the plan for Communicating Progress are detailed in section V.B.3.a. of the narrative proposal.

4. **Site Eligibility and Property Ownership Eligibility (Site-Specific Proposals Only):** This application is for a community-wide assessment grant; therefore, no site-specific property information is required.



ARKANSAS
Department of Environmental Quality



November 14, 2014

Tracee McKenna
Director of Community Development
Western Arkansas Planning and Development District
PO Box 2067
Fort Smith, AR 72902

Re: Letter of support for FFY14 EPA Brownfields Hazardous and Petroleum Assessment
Grant Application

Dear Ms. McKenna:

This letter serves as the Arkansas Department of Environmental Quality's acknowledgement that the Western Arkansas Planning and Development District is seeking to become a recipient of a Hazardous Substance and Petroleum Assessment grant to identify sites of possible contamination.

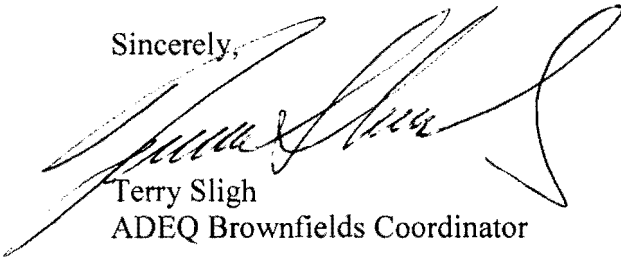
The Hazardous and Petroleum Assessment Grant, if awarded, will facilitate community-wide assessment work in Sebastian, Crawford, Franklin, Logan, Scott, and Polk counties in the Western Arkansas region.

ADEQ has worked closely in the past with brownfields projects in the Western Arkansas region and will continue to offer contractor assistance and State oversight to complete Comprehensive Site Assessments under the State response program.

ADEQ would like to offer our support for this application for federal grant funds and best wishes in your endeavors to demonstrate the benefits of redeveloping brownfields in the West Central Arkansas area.

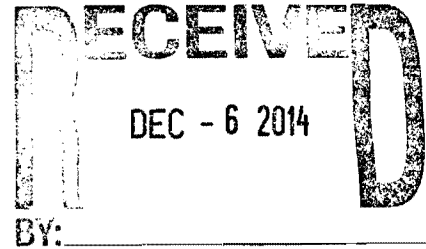
Please do not hesitate to contact me at (501) 682-0867 or terry@adeq.state.ar.us if further assistance is needed.

Sincerely,



Terry Sligh
ADEQ Brownfields Coordinator

cc: Amber Perry, Region 6, EPA Brownfields



December 4, 2014

Tracee McKenna
Director of Community Development
Western Arkansas Planning and Development District
PO Box 2067
Fort Smith, AR 72092

Dear Ms. McKenna,

I was pleased to hear of your efforts to address the brownfields in our region. Specifically, I am interested in your efforts as they relate to the City of Fort Smith.

As Chairman for the Fort Smith Central Business Improvement District, I see great value in this program and its benefit to the CBID. As you know, the purpose of this commission is to bring new investors to the district and to reduce blight. The commission can buy, sell, loan or borrow money, own property, lease property, assess property owners within the boundary or use eminent domain as a mechanism to achieve the common goal of increasing the property values within the boundary and encourage public improvements within the legal boundaries of the district.

One of the tasks of the CBID is to market the District for investment to increase employment levels, increase the property value, and increase the City's revenues all ultimately reducing blight. As the brownfields program aims to achieve these same goals, I offer my support. Furthermore, I would be happy to assist with the identification and prioritization of sites for assessment under the brownfields program should your application be funded.

I look forward to working with you on this project and others.

Sincerely,


Richard Griffin,

BEAUTIFY FORT SMITH
6712 WOODLAND CIRCLE
FORT SMITH, ARKANSAS 729916

I am Nancy Smreker, President of Beautify Fort Smith. We are a volunteer-driven group of citizens dedicated to enhancing the image and appearance of Fort Smith, Arkansas by creating a successful and aesthetically pleasing community. I would like to express my support on behalf of Beautify Fort Smith for the Brownfields Assessment Grant which is being applied for by WAPDD. Tracee McKenna, Director of Community Development, has explained the purpose of the grant and how this project could benefit Fort Smith. I understand that the grant would allow for cleaning up and reinvesting in brownfield properties to protect the environment, reduce blight, and take development pressures off greenspaces and working lands.

Beautify Fort Smith is a project driven group of volunteers who work on projects that will improve the appearance of Fort Smith by cleaning up property which is littered, overgrown with weeds, unusable for any purpose and considered unattractive. We seek to make areas beautiful by cleaning up litter and planting trees and flowers in the spaces we have funding to renovate. Currently we are landscaping the interchange at I540 and Rogers Avenue in Fort Smith and planting over 100 trees, 500 roses, 1,000 liriope plants, 200 flats of annual flowers, and 4,500 square yards of sod. This is funded through donations from community leaders and businesses. We have just negotiated a new contract to have the interchange mowed and edged by weed eater and litter picked up 2 times per month annually. This is our passion to improve the appearance of our city to provide environmental, health, and economic benefits for our area. This is exactly what the EPA Brownfields Assessment Grant will do for our community also.

Beautify Fort Smith will fully support this project by identifying and prioritizing sites within Fort Smith for assessment. We will also assist with any sites that are redeveloped as greenspace. A few suggestions of brownfields are:

1. 2 abandoned buildings at 38th and Grand Avenue next to 1001 Grand Avenue
2. Abandoned service station next to 4111 Grand Avenue
3. Abandoned house at 608 Greenwood Avenue
4. Vacant lot between 909 and 917 Garrison where a building burned to the ground
5. Vacant lot at the corner of South 10th and Rogers Avenue across from Marriott Courtyard 900 Rogers Avenue
6. 1200 Phoenix Avenue – vacant building – old furniture consignment store
7. Abandoned service station at 2102 Towson
8. Shell Station – vacant at 3630 Towson
9. Whirlpool property

We fully support the application for the EPA Brownfields grant by WAPDD Tracee McKenna and will provide volunteers and financial support for any sites that are redeveloped as greenspace. This grant would benefit Fort Smith in so many ways and is desperately needed in order to improve our city and promote the economic development of our area.

I appreciate your consideration in awarding this EPA Brownfields Assessment Grant to Tracee McKenna with WAPDD.

Sincerely,

Nancy Smreker

President, Beautify Fort Smith

November 21, 2014

Fort Smith Housing Authority

2100 North 31st Street
Fort Smith, Arkansas 72904
(479) 782-4991 FAX (479) 782-0120
www.fortsmithhousing.org

December 12, 2014

Ms. Tracee McKenna
Director of Community Development
Western Arkansas Planning and Development District
PO Box 2067
Fort Smith, AR 72902

Dear Ms. McKenna:

Thank you for taking the time to discuss the impact that brownfields are having on our area and your efforts to address them with me.

As you know from our previous work together, the mission of the Fort Smith Housing Authority (FSHA) is to develop, rehabilitate and manage decent, safe and sanitary quality affordable housing. As we discussed, many of the identified brownfields are concentrated within the same service area of the Fort Smith Housing Authority, and we would be very interested in seeing these properties assessed in order that redevelopment can occur. Specifically, the FSHA has an interest in the Littlefield Oil property, the OGE substation and the former glass plant.

The FSHA operates in a manner that promotes equal opportunity, fair housing goals and the de-concentration of race and poverty. As the brownfields program aims to achieve these same goals, I offer my support. Furthermore, I would be happy to assist with the identification and prioritization of sites for assessment under the brownfields program should your application be funded.

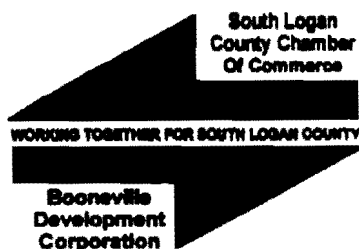
The FSHA will also gladly assist WAPDD by hosting meetings in order to inform the public about the brownfields program. In addition, we will support WAPDD by disbursing information about the brownfields project through our office

I look forward to working with you on this project and others.

Sincerely,



Kenneth L. Pyle
Executive Director



**Booneville Development Corporation
South Logan County Chamber of Commerce**

Working Together For South Logan County

December 4, 2014

Tracee McKenna
Director of Community Development
Western Arkansas Planning and Development District
PO Box 2067
Fort Smith, AR 72902

Re: Letter of Support for EPA Brownfields Assessment Grant

Dear Ms. McKenna:

I am writing this letter on behalf of the Booneville Development Corporation/South Logan County Chamber of Commerce in support of Western Arkansas Planning and Development District's EPA Brownfields Assessment Grant Application.

The BDC/SLC Chamber works with citizens and organizations in the region to create a better economy and quality of life for the residents of Booneville and South Logan County. WAPDD's efforts to improve western Arkansas through the assessment and cleanup of brownfields would be of great benefit to us in fulfilling that mission.

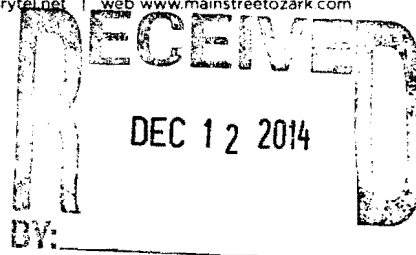
The BDC/SLC Chamber will gladly assist WAPDD by hosting meetings in order to inform the public about the brownfields project and also help identify brownfields in our communities. In addition, we will support WAPDD by disbursing information about the brownfields project through our office and also at community events.

Sincerely,

Stacey McCollough
Executive Director



300 West Commercial St. Ozark, AR 72949 (479) 667 5337 Office 479-667-0248 FAX
email mainstreetozark@centurytel.net web www.mainstreetozark.com



November 24, 2014

Tracee McKenna
Director of Community Development
Western Arkansas Planning and Development District
PO Box 2067
Fort Smith, AR 72902

Re: Letter of Support for FY 15 EPA Hazardous and Petroleum Assessment Grants Application

Dear Ms. McKenna,

Main Street Ozark supports the Western Arkansas Planning and Development District's (WAPDD) EPA Hazardous and Petroleum Assessment Grant Application.

Main Street Ozark is part of the National Main Street Program and encourages the development, redevelopment, promotion and improvement of the downtown area in Ozark, Arkansas through education and historic preservation.

As Executive Director of Main Street Ozark, I see firsthand how a declining downtown can be detrimental to a community. I fully support WAPDD's efforts to eliminate Brownfields and help redevelop and revitalize the downtown districts of our area.

In support of WAPDD's Brownfields Assessment Grant, Main Street Ozark will assist WAPDD by helping identify brownfields and disbursing information through our office and at community events.

I know of the accomplishments of the Western Arkansas Planning and Development District and support their ongoing efforts to help communities in Sebastian, Crawford, Franklin, Logan, Scott, and Polk Counties in the Western Arkansas region.

Sincerely,

Sandy Key
Executive Director



"Helping you do what you do"

December 8, 2014

Tracee McKenna
Director of Community Development
Western Arkansas Planning and Development District
PO Box 2067
Fort Smith, AR 72902

Re: Letter of Support for EPA Brownfields Assessment Grant

Dear Ms. McKenna,

The Ozark Chamber of Commerce support Western Arkansas Planning and Development District's EPA Brownfields Assessment Grant Application.

The Ozark Chamber of Commerce consists of business people working together to make Ozark a better place in which to live and make a living. We work with the City of Ozark as well as Main Street Ozark to accomplish our goal. Additionally, we realize the importance of regionalism in today's economy and therefore support the efforts of those across western Arkansas to improve our area.

WAPDD's effort to improve western Arkansas through the assessment and eventual cleanup of brownfields aligns with our goals and we support your efforts.

The Ozark Chamber of Commerce will gladly assist WAPDD with the identification and prioritization of brownfields in our community. In addition, we will support WAPDD by assisting with the coordination of public meetings and also by disbursing information about the brownfields project through our office and also at community events.

Sincerely,

Linda Millsap
Executive Director